

JONATHAN S. ABADY  
MATTHEW D. BRINCKERHOFF  
ANDREW G. CELLI, JR.  
RICHARD D. EMERY  
DEBRA L. GREENBERGER  
DIANE L. HOUK  
DANIEL J. KORNSTEIN  
JULIA P. KUAN  
HAL R. LIEBERMAN  
ILANN M. MAAZEL  
KATHERINE ROSENFELD  
ZOE SALZMAN  
SAM SHAPIRO  
EARL S. WARD  
O. ANDREW F. WILSON

ATTORNEYS AT LAW  
600 FIFTH AVENUE AT ROCKEFELLER CENTER  
10<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10020  
  
TEL: (212) 763-5000  
FAX: (212) 763-5001  
www.ecbawm.com

MONDAIRE JONES  
VASUDHA TALLA  
  
ERIC ABRAMS  
NICK BOURLAND  
HANNAH BRUDNEY  
DANIEL M. EISENBERG  
ARIADNE M. ELLSWORTH  
SARA LUZ ESTELA  
LAURA S. KOKOTAILO  
SONYA LEVITOVA  
SARAH MAC DOUGALL  
SANA MAYAT  
HARVEY PRAGER  
VIVAKE PRASAD  
MAX SELVER  
EMILY K. WANGER  
RACHAEL WYANT

July 3, 2024

**By ECF**

Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

*Re: Nunez v. City of New York*, 11 Civ. 5845 (LTS)

Dear Judge Swain:

We write on behalf of the Plaintiff Class. Pursuant to Your Honor's July 1, 2024 Order, Dkt. 741, Plaintiffs are filing the following materials under seal:

1. Exhibit A- Plaintiffs' Revised Proposed Findings of Fact
2. Exhibit B- Chart of Outstanding Disputes regarding Plaintiffs' Findings of Fact

These materials discuss content that this Court already determined should be filed under seal in earlier briefing. Dkts. 613, 734. On July 8, 2024, Plaintiffs will file redacted versions of these materials publicly.

Respectfully submitted,

/s/ \_\_\_\_\_

Mary Lynne Werlwas  
Kayla Simpson  
Katherine Haas  
Sophia Gebreselassie  
THE LEGAL AID SOCIETY  
PRISONERS' RIGHTS PROJECT

Counsel for Plaintiff Class

/s/ \_\_\_\_\_

Debra L. Greenberger  
Jonathan Abady  
Vasudha Talla  
Sana Mayat  
EMERY CELLI BRINCKERHOFF  
ABADY WARD & MAAZEL LLP

Counsel for Plaintiff Class